

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**OBJECTIONS OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN  
(December 23, 1997)**

The United States Postal Service hereby files these objections to the following interrogatories of David Popkin, dated November 20, 1997.

DBP/USPS-96(a)

This interrogatory takes issue with a previous interrogatory response by asking why another answer was not given. The Postal Service considers DBP/USPS-96(a) to be *argumentative, rather than inquisitive*. Accordingly, the Postal Service considers that it is an improper use of discovery to which it is not obliged to respond in the form of an interrogatory response.

DBP/USPS-98

This interrogatory asks whether the Postal Service, for a period following the conclusion of Docket No. N89-1, made "a specific request to mailers for suggestions regarding changes in delivery standards" and, if so, why this practice was stopped.

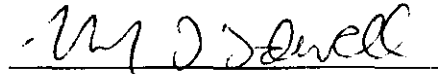
Questions related to whether the Postal Service has or should solicit public comments regarding changes in delivery standards are not relevant to the costing and pricing issues before the Commission in Docket No. R97-1. Accordingly, the Postal Service objects to this interrogatory.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 23, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Michael T. Tidwell

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December 23, 1997